

BEFORE THE
POSTAL REGULATORY COMMISSION
WASHINGTON, D.C. 20268-0001

MAIL PROCESSING NETWORK
RATIONALIZATION SERVICE CHANGES, 2011

Docket No. N2012-1

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS BRADLEY
TO NPMHU INTERROGATORY NPMHU/USPS-T10-19
(March 9, 2012)

The United States Postal Service hereby provides the response of witness Michael Bradley to the above-listed interrogatory of the National Postal Mail Handlers Union. The interrogatory is stated verbatim and followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

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March 9, 2012

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NPMHU/USPS-T10-19

Referring to the list of consolidation decisions published by the Postal Service on February 23, 2012 at <http://about.usps.com/what-we-are-doing/our-future-network/assets/pdf/communications-list-022212.pdf>, and to your response to NPMHU/USPS-T10-10, in which you stated "if AMP studies or any reason caused the Postal Service to redefine the list of active and inactive sites, that redefinition could affect my estimated cost savings . . . ":

- a) Given that the Postal Service has decided that only forty of the 252 potential consolidations should be fully closed, how does that affect your calculations of cost savings?
- b) Given that the Postal Service has not approved approximately forty-one out of the 252 potential consolidations, how does that affect your calculations of cost savings?
- c) Please provide updated cost savings, with supporting data in the form of Library References, based upon all the consolidation decisions contained in the Postal document at <http://about.usps.com/what-we-are-doing/our-future-network/assets/pdf/communications-list-022212.pdf>.

RESPONSE:

- a. It would not affect my cost savings estimates as they are not based upon the results of the AMP studies. As indicated by witness Williams, in his response to APWU/USPS-T1-26, AMP studies "are not designed to capture network-wide cost changes." Moreover, the Postal Service has not informed me of any redefinition of the list of active and inactive sites.
- b. It would not affect my cost savings estimates as they are not based upon the results of the AMP studies. As indicated by witness Williams, in his response to APWU/USPS-T1-26, AMP studies "are not designed to capture network-wide cost changes." Moreover, the Postal Service has not informed me of any redefinition of the list of active and inactive sites.
- c. Not applicable.